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9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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12 People of the State of California, et al.

13 v.

14 Meta Platforms, Inc., Instagram, LLC, Meta
15 Payments, Inc., Meta Platforms Technologies,
16 LLC

17 IN RE: SOCIAL MEDIA ADOLESCENT
18 ADDICTION/PERSONAL INJURY PRODUCTS
19 LIABILITY LITIGATION

20 THIS DOCUMENT RELATES TO:

21 4:23-cv-05448.

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

**STIPULATED REQUEST FOR AND
[PROPOSED] ORDER EXTENDING
THE STATE ATTORNEYS GENERAL'S
TIME TO MOVE TO STRIKE ANY
PORTION OF THE META
DEFENDANTS' ANSWER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

22 Pursuant to Civil Local Rules 6-2 and 7-12, the State Attorneys General ("State AGs") and Meta
23 Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC ("Meta")
24 (collectively, "the Parties"), through their undersigned counsel, and as supported by the concurrently filed
25 Declaration of Megan O'Neill, hereby stipulate as follows:

26 1. Meta filed its Answer to the State AGs' Complaint on October 17, 2024 (the Answer). Dkt.
27 No. 125.

3. The State AGs believe that certain defenses are improper, and have been working diligently to evaluate the Answer and consult with their coalition regarding a motion to strike under Fed. R. Civ. P. 12(b)(7). Such a motion would currently be due on November 7, 2024.

4. On November 5, 2024, in response to the State AGs' communication about a potential motion to strike, Meta informed the State AGs that Meta intends to file an amended answer and is willing to confer with the State AGs about affirmative defenses that the State AGs may move to strike. The deadline for Meta to amend its answer as of right is November 7, 2024. *See* Fed. R. Civ. P. 15(a)(1)(A).

5. The Parties have agreed that they will confer over the next ten (10) days regarding a schedule for both the filing of an amended answer and any motion to strike, including to establish agreed-upon deadlines for any amended answer, motion to strike, and subsequent briefing. The State AGs have consented to the filing of Meta's amended answer on a date to be agreed upon by the Parties after November 7, 2024.

6. The Parties agree that they will submit proposed deadlines for the filing of Meta's amended answer and the State AGs' motion to strike by no later than November 20, 2024, and that in the meantime an extension of the State AGs' time to file a motion to strike any portion of the Answer to November 27, 2024 would allow adequate time for the Parties to complete this meet-and-confer process.

7. The Parties submit that this proposal is consistent with the timeline of this MDL, which departs from the conventional timeline of the Federal Rules of Civil Procedure due to the complexity of issues involved in this case.

8. The Parties agree that the relief sought herein will not prejudice either Party.

9. There have been no previous time modifications in this case with respect to the filing of Meta's amended answer or the State AGs' response to Meta's Answer, though the Court recently granted an extension of discovery, Rule 702, and summary judgment deadlines that were mutually agreed on by the parties (*In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047 (N.D. Cal. Oct. 29, 2024), Dkt. No. 1290).

1 10. The Parties agree that the relief sought herein will not affect the schedule of this case.

2 11. Therefore, pursuant to Local Rules 6-2 and 7-12, the Parties stipulate and respectfully
3 request that the Court extend the State AGs' deadline to file a motion to strike Meta's Answer (Dkt. No.
4 125) or any portion thereof under Fed. R. Civ. P. 12(f), to and including November 27, 2024.

5 **IT IS SO STIPULATED AND AGREED.**

6
7 DATED: November 6, 2024

Respectfully submitted,

8 **PHILIP J. WEISER**

9 Attorney General
10 State of Colorado

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12 *Zuckerberg*

SIGNATURE CERTIFICATION

Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: November 6, 2024

/s/ Megan O'Neill

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IT IS SO ORDERED.

DATED this ____ day of _____, 2024.

YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE